From: **Richard Bauer/R9/USEPA/US**
Sent: 2/27/2012 11:09:01 AM

To: Cynthia Caporale/ESC/R3/USEPA/US@EPA; Ex. 4 - CBI lmco.com
CC: Robin Costas/ESC/R3/USEPA/US@EPA; Stevie Wilding/ESC/R3/USEPA/US
Subject: Re: Fw: Verification/Completeness Check for R9 SDG 12032A Posted Feb 21) and R9 (SDG 12033A Posted Feb 21)

Here is response to items in verification check report below (SERAS-001-DSR-022412_Dimock_10).

See below in blue.

File 12032A_rsk 175.pdf
1. It appears as if the sample results for methane were not qualified based on field or trip blank results. This becomes problematic to assess since it is not known if both trip blanks (TB08 and TB09) arrived in the same sample cooler or whether EB01 (equipment blank) collected on 1/28/12 is applicable to the samples collected on 1/30/12. The frequency of equipment blanks (1 per day, etc.) to be collected needs to be checked in the project-specific QAPP before any qualifications can be assigned. A consensus decision needs to be made if the highest level of contamination (method, field, trip, equipment blanks) will be used to qualify the results "U" with the RL being elevated to the highest level found in the blank or the results left "as is".

I agree that it is difficult to associate particular trip blanks, field blanks, and equipment blanks with specific samples. This was especially true for the first few shipments of samples. It will be helpful for you to look at the COCs that were annotated during sample receiving. The COCs **do** reflect the contents of a particular cooler and we have assigned and written a cooler number on each COC page for each day of receipt. I have attached COCs relevant to the two SDGs referenced in this memo. Please feel free to request additional COCs for any other SDGs you will be reviewing.

Sample results for SDG 12032A were qualified based on method blank results. All detected sample values less than 5X the associated method blank were qualified as estimated "J" and received a comment flag "B1" (note legend for comments and qualifiers on p. 5 of the report). Sample results were **NOT** qualified based on field or trip blanks for this SDG. The EPA Region 9 Laboratory does not follow the National Functional Guideline for its internal review procedures and does not routinely qualify results based on field QC samples. Qualification based on field QC is typically performed during external review and validation of the data. Subsequent to issuance of the report for SDG 12032A, EPA Region 3 requested that we start qualifying results based on trip blanks and field blanks as well as laboratory QC. This was started with SDG 12033A, but was not retroactively applied.

2. It is assumed that all instrument QC (RSD, %D, retention time windows, LCV, SCV, etc) were performed and within the acceptance criteria listed in the SOP.

Results are flagged based on all QC results, including instrument QC (RSD, %D, etc.). This does not mean that all QC results were within the acceptance criteria listed in the SOP, and this should not be assumed. For example, a CCV or quantitation limit standard that fails high is an indication of possible high bias in associated samples. Non-detect results in samples are not flagged for possible high bias. Our QA plan (previously sent) provides guidance on flagging in Appendix M.

File 12032a_tph_purgeable.pdf
1. It is assumed that all instrument QC (RSD, %D, retention time windows, LCV, SCV, etc) were performed and within the acceptance criteria listed in the SOP.

See response above.

File 12032a_tph_extractable.pdf
1. It is assumed that all instrument QC (RSD, %D, retention time windows, LCV, SCV, etc) were performed and within the acceptance criteria listed in the SOP.

See response above.

File 12033A_rsk 175.pdf
1. For the samples run under batch B2B0008, the highest level of methane in the blanks was found in TB12 at a concentration of 1.2 µg/L. All samples including one field blank and four trip blanks) were received at the laboratory on 2/2/12. Again it is not

known if all samples arrived in the same sample cooler or if three separate coolers were received corresponding to each COC. A consensus decision needs to be made if the highest level of contamination (method, field, trip, equipment blanks) will be used to qualify the results "U" with the RL being elevated to the highest level found in the blank or the results left "as is".

See response above.

2. It is assumed that all instrument QC (RSD, %D, retention time windows, LCV, SCV, etc) were performed and within the acceptance criteria listed in the SOP.

See response above.

File 12033a_tph_purgeable.pdf
1. It is assumed that all instrument QC (RSD, %D, retention time windows, LCV, SCV, etc) were performed and within the acceptance criteria listed in the SOP.

See response above.

File 12033a_tph_extractable.pdf
1. It is assumed that all instrument QC (RSD, %D, retention time windows, LCV, SCV, etc) were performed and within the acceptance criteria listed in the SOP.

See response above.

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Richard Bauer
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(510) 412-2312
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From: Cynthia Caporale/ESC/R3/USEPA/US
To: Richard Bauer/R9/USEPA/US@EPA
Cc: Robin Costas/ESC/R3/USEPA/US@EPA
Date: 02/24/2012 11:18 AM
Subject: Fw: Verification/Completeness Check for R9 SDG 12032A Posted Feb 21) and R9 (SDG 12033A Posted Feb 21)

Richard,

Here is another completeness check report for your review.

Cindy

Cynthia Caporale, Chief
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U.S. EPA Region III
Environmental Science Center
Fort Meade, MD
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----- Forwarded by Cynthia Caporale/ESC/R3/USEPA/US on 02/24/2012 02:18 PM -----

From: Ex. 4 - CBI
To: Kelley Chase/R3/USEPA/US@EPA, Cynthia Caporale/ESC/R3/USEPA/US@EPA
Cc: John Gilbert/CI/USEPA/US@EPA, Gary Newhart/CI/USEPA/US@EPA, Sella Burchette/ERT/R2/USEPA/US@EPA, Ex. 4 - CBI
Ex. 4 - CBI
Date: 02/24/2012 01:51 PM
Subject: Verification/Completeness Check for R9 SDG 12032A Posted Feb 21) and R9 (SDG 12033A Posted Feb 21)

……is attached for the following files: 12032A_rsk 175.pdf, 12032a_tph_purgeable.pdf, 12032a_tph_extractable.pdf, 12033A_rsk 175.pdf, 12033a_tph_purgeable.pdf, 12033a_tph_extractable.pdf.

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Lockheed Martin

Scientific, Engineering, Response and Analytical Services (SERAS)

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